

THOUGHTWIRE PRIVACY POLICY

ThoughtWire takes the privacy of personal information seriously, including personal information we process on our customer's behalf, and we have prepared this Privacy Policy to describe the manner in which we treat personal information.

ThoughtWire provides services, software and mobile applications ("Services") to its customers in connection with its proprietary operations performance management system (the "ThoughtWire Platform"). This Privacy Policy applies to personal information we process in the course of providing the ThoughtWire Platform and Services on behalf of our customers, as well as the personal information we collect, such as through our website, www.thoughtwire.com (the "Website").

I. HOW INFORMATION IS COLLECTED AND USED BY THOUGHTWIRE

Information We Process on Behalf of Our Customers

In the course of providing the ThoughtWire Platform and Services to our customers, we may collect or have access to personal information as set out below:

- **Information required to provide the Services:** We provide Services on behalf of our customers in the private, public and health sectors. In the course of providing these Services (which may include installation, hosting, maintenance and support services, testing, reporting, or disaster recovery testing), we may require access to, store or process personal information of our customer's patients, customers or other individuals. Depending on the customer and Services we provide, this information may contain personal information or personal health information. We do not use such information for any other purpose except as authorized by our client or required by law. We rely on our customers to ensure that they have obtained all necessary authority and consent to enable us to provide the Services and process personal information on their behalf, and to otherwise comply with applicable privacy laws when collecting, using or disclosing personal information in connection with the Services. If you have any questions regarding the collection and use of personal information in connection with the Services, please email us at the contact information in the "Questions" section below. We will refer all questions or inquiries regarding a specific customer to that customer so that they can respond to you.
- **Information required for account creation and billing purposes:** We collect business contact information (such as first and last name, work email address, phone number, and job title) of our customers and other authorized users of the Services in order to create and administer our customer's account, invoice customers and resolve billing inquiries.
- **Use of the Services:** We may monitor our customers' and authorized users' access to and use of the ThoughtWire Platform (for example, date and time of access, services or applications used, browser information, IP address) in order to detect, investigate or prevent any actual or potential violation of our terms and conditions.

Information We Collect and Use Through the Website and Other Interactions

- **Inquiries:** If you contact us with an inquiry, you may be asked for information that identifies you, such as your name, work email address and telephone number, along with additional information we need to help us promptly answer your inquiry. We may retain this information to assist you in the future and to improve our customer service and service offerings.
- **Form Submission:** When you submit a form, such as request a demo, submit a service request, or download a company info sheet, we collect your name, work email address, company name, job title, and country, and give you the option to provide your industry, application of interest, and phone number. We use this information to contact you and otherwise better facilitate your form request.
- **Communications:** We may offer you the ability to sign-up to receive ThoughtWire marketing and promotional communications. We use this information to send you the communications you have requested to receive. You can opt-out of receiving promotional emails from us by following the opt-out or "unsubscribe" instructions provided in your email or other message, or by contacting us as set out below. Please note that you will continue to receive informational electronic messages from us.

- **Market Research:** We may collect and use de-identified data to conduct marketing and sales activities (including generating leads, pursuing marketing prospects, performing market research, determining and managing the effectiveness of our advertising and marketing campaigns and managing our brand).
- **Job Applications:** If you apply for a job at ThoughtWire, you may provide us with certain personal information about yourself, such as information contained in a resume, cover letter, or similar employment-related materials. We use this information for the purpose of processing and responding to your application and assessing your suitability for current and future career opportunities.

II. HOW THE INFORMATION IS SHARED

ThoughtWire does not disclose, trade, rent, sell or otherwise transfer authorized users' personal information to third parties except as set out in this Privacy Policy or as authorized by our customer. ThoughtWire may transfer or disclose personal information as follows:

Affiliates and Service Providers: ThoughtWire may from time to time use the services of affiliates and third-party service providers to provide services on behalf of ThoughtWire in connection with our Website, ThoughtWire Platform or Services. For example, we may use service providers to host our Website, store data, provide back-up services, provide advertising and analytics services and process customer payments. ThoughtWire requires the service providers to commit to protect the security and confidentiality of information including personal information that is provided to them.

Personal information may be maintained and processed by ThoughtWire or its third-party service providers in the United States and Canada. However, with respect to personal information we maintained on behalf of our customers, unless otherwise specified, ThoughtWire maintains its servers in Canada and hosts customer's production database in the customer's country of residence. For customers located outside Canada, ThoughtWire may access a customer's data from Canada for maintenance and support services such as responding to support requests, fixing software issues, or, providing services to a customer on the back end of the platform.

For more information about the way in which our service providers treat personal information, contact us as set out in the "Questions" section below.

Legal: ThoughtWire and our service providers may disclose authorized user's personal information: (a) to any governmental authority as part of an investigation to determine ThoughtWire's compliance with any applicable law, rule or regulation (including privacy laws, rules and regulations); (b) in response to a court order, subpoena, discovery request or other lawful judicial or administrative proceeding which may include disclosure pursuant to a lawful access request by United States or other courts, law enforcement or government authorities; (c) as otherwise permitted or required under any applicable law, rule or regulation; and (d) in good faith, to protect or defend the rights or property of ThoughtWire and other customers or users.

Sale of Business: ThoughtWire may transfer personal information as an asset in connection with a prospective or completed merger or sale (including transfers made as part of insolvency or bankruptcy proceeding) involving all or part of ThoughtWire's or as part of a corporate reorganization or other change in corporate control.

III. INFORMATION ABOUT OUR WEBSITE

Visiting our Website: We collect the IP (Internet protocol) addresses of all visitors to our Website and other related information such as page requests, browser type, operating system and average time spent on our Website. We use this information to help us understand our Website activity, and to monitor and improve our Website.

Cookies: Our Website uses a technology called "cookies". A cookie is a tiny element of data that our Website sends to a user's browser, which may then be stored on the user's hard drive so that we can recognize the user's computer or device when they return. You may set your browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our Website, you may not be able to take advantage of all of the Website features. We may also use a third party to help us gather and analyze information about the areas that users visit on our Website to evaluate and improve the customer experience and the convenience of the Website.

Third Party Links: Our Website may contain links to other websites that ThoughtWire does not own or operate. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. The linked websites have separate and independent privacy policies, notices and terms of use. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat personal information. We encourage you to read the privacy policy of every website you visit.

Analytics: We may use a third party such as Google Analytics to help us gather and analyze information about the areas visited on the Website (such as the pages most read, time spent, search terms and other engagement data) in order to evaluate and improve the user experience and the convenience of the Website. You can obtain additional information on Google Analytics' collection and processing of data, including how to opt out, by clicking on the links provided: [Privacy & Terms](#) and [Data Privacy & Security](#).

IV. HOW THE INFORMATION IS PROTECTED

ThoughtWire has implemented reasonable administrative, technical and physical safeguards in an effort to protect against unauthorized access, use, modification and disclosure of personal information in our custody and control. Our service providers are given the information they need to perform their designated functions, and we do not authorize them to use or disclose personal information for their own marketing or other purposes.

We are committed to educating our staff about the protection of personal information, and the importance of compliance with applicable privacy legislation and company policies. Employees and contractors are required to agree to protect the security and confidentiality of personal information.

These safeguards are designed to help prevent unauthorized access, maintain data accuracy, and ensure the appropriate use of personal information; however, it is important to remember that no system can guarantee 100% security at all times. In the event that we detect a threat to security or a security vulnerability, we may attempt to contact you or our customers to recommend protective measures. We have processes in place to respond to such incidents and notify our customers in accordance with requirements under applicable law.

V. REVIEWING, UPDATING AND ACCESSING INFORMATION

If an authorized user wishes to review or update information collected by ThoughtWire, they may log in to their account to make changes.

If we receive a request from an individual to access personal information we maintain on behalf of a customer in the course of providing the Services, we will direct that individual to the relevant customer. We will assist our customers wherever possible in responding to individual access requests.

VI. PRIVACY POLICY CHANGES

We may change our Privacy Policy to reflect changes in our personal information practices or applicable law. ThoughtWire will post the updated Privacy Policy on this Website, and will provide customers advance notice of any material changes to this Privacy Policy.

VII. RETENTION AND DELETION

ThoughtWire will retain personal information for no longer than necessary for the purposes for which it was collected as outlined in this Policy, as instructed by our customers or as otherwise required to meet legal or business requirements. After all applicable retention periods have expired, we will delete or destroy your personal information in a manner designed to ensure that it cannot be reconstructed or read. If, at any time, it is not feasible for us to delete or destroy your personal information, we will continue using the same safeguards of protection and security outlined in this Policy and our internal security policies.

VIII. CHOICES

You can choose to opt-out of receiving promotional emails from us by following the opt-out or “unsubscribe” instructions provided in your email or other message, or by contacting us as set out below. Please note that you will continue to receive transactional and account-related electronic messages from us. For any other requests, please contact us as set out below.

IX. QUESTIONS

It is ThoughtWire’s goal to ensure that its privacy practices are comprehensible and easy to understand. If you have any questions, concerns, comments or would like more detailed information on the manner in which we or our service providers treat personal information, please email the ThoughtWire Privacy Officer at ThoughtWire:

privacy@thoughtwire.com

ThoughtWire reserves the right to update this policy at any time.

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